

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

DEBORAH CHIN, Individually And On Behalf Of All
Others Similarly Situated,

Plaintiff,

VS.

SONUS NETWORKS, INC., HASSAN AHMED, and
STEPHEN NILL,

Defendants.

: Case No.: 1:04cv10294-DPW

• RELATED CASES:

1:04-cv-10307-DPW

1:04-cv-10308-DPW

1:04-cv-10310-DPW

1:04-cv-10329-DPW

1:04-cv-10333-DPW

1:04-cv-10345-DPW

1:04-cv-10346-DPW

1:04-cv-10359-DPW

1:04-cv-10362-DPW

1:04-cv-10363-DPW

1:04-cv-10364-DPW

1:04-cv-10382-DPW

1:04-cv-10383-DPW

1:04-cv-10384-DPW

1:04-cv-10454-DPW

1:04-cv-10576-DPW

1:04-cv-10597-DPW

1:04-cv-10612-DPW

1:04-cv-10623-DPW

RICHARD CURTIS, Individually And On Behalf Of
All Others Similarly Situated,

Plaintiff,

VS.

SONUS NETWORKS, INC., HASSAN M. AHMED
and STEPHEN J. NILL,

Defendants.

Case No.: 1:04cv10314-MLW

**MOTION OF THE JIANG GROUP FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF LEAD PLAINTIFF'S
SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL**

Tian Jiang, Joseph Rodulavic, and Gary Brost (collectively known as “the Jiang Group” or “Movants”) by their counsel, hereby move this Court for an Order: (i) consolidating for all purposes the above-captioned related actions; (ii) appointing the Jiang Group as Lead Plaintiff; (iii) approving the Jiang Group’s selection of the law firm of Milberg Weiss Bershad Hynes & Lerach LLP to serve as Lead Counsel and Moulton & Gans P.C. to serve as Liaison Counsel. In support of this Motion, Movants submit herewith a Memorandum of Law, a Declaration, and a [Proposed] Order.

REQUEST FOR ORAL ARGUMENT

Movants respectfully request oral argument on this motion.

DATED: April 12, 2004

Respectfully submitted,

MOULTON & GANS, P.C.

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RULE 7.1(A) CERTIFICATE

I, Nancy Freeman Gans, Proposed Liason Counsel, hereby certify that on April 12, 2004, I notified Daniel Halston, Esq., Hale and Dorr, LLP, counsel for Defendant Sonus Networks, John Baraniak, Esq., Choate, Hall & Stewart, counsel for Defendant Hassan Ahmed, Ph.d, and Matthew J. Matule, Esq., Skadden, Arps, Slate, Meagher & Flom, LLP, counsel for Defendant Stephen J. Nill, of the filing of the Motion of the Jiang Group for Consolidation, Appointment of Lead Plaintiff and Approval of Selection of Lead Counsel and Liason Counsel. The motion for appointment of lead plaintiff is required by statute. The Defendants consent to the Motion for Consolidation only.

DATED: April 12, 2004

Respectfully submitted,

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CERTIFICATE OF SERVICE

On April 12, 2004, I, Sharon M. Lee, an associate of the law firm of Milberg Weiss Bershad Hynes & Lerach LLP, one of the plaintiffs' counsel in this action, caused the following documents to be served by U.S. Mail, on the persons listed below:

1. MEMORANDUM OF LAW IN SUPPORT OF THE MOTION OF THE HOMEYER GROUP FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF CO-LEAD COUNSEL AND LIAISON COUNSEL;
2. MOTION OF THE JIANG GROUP FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL;
3. DECLARATION OF NANCY F. GANS IN SUPPORT OF THE MOTION OF THE JIANG GROUP FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND FOR APPROVAL OF ITS SELECTION OF LEAD COUNSEL; and
4. [PROPOSED] ORDER CONSOLIDATING THE ACTIONS, APPOINTING LEAD PLAINTIFF, AND APPROVING LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL.

Dated April 12, 2004

/s/Sharon M. Lee
Sharon M. Lee

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